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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

)	Case No. 3:21-cv-00389-CRB
ABANTE ROOTER AND)	
PLUMBING INC., individually and)	
on behalf of all others similarly)	
situated,)	JOINT STIPULATION OF
Plaintiff,)	DISMISSAL OF ACTION OF THE
vs.)	INDIVIDUAL CLAIMS
CARD GROUP INTERNATIONAL,)	WITH PREJUDICE AND THE
LLC, a Corporation; DOES 1-10)	PUTATIVE CLASS CLAIMS
inclusive, and each of them,)	WITHOUT PREJUDICE
Defendants.)	
)	

NOW COME THE PARTIES by and through their attorneys to respectfully move this Honorable Court to dismiss this matter with prejudice as to Plaintiff's individual claims and without prejudice as to the putative Class pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii). Each party shall bear their own costs and attorney fees.

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1 Respectfully submitted this 12th Day of November, 2021,

2 **LAW OFFICES OF TODD M. FRIEDMAN P.C**

3 **By: s/Adrian R. Bacon**

4 **ADRIAN R. BACON Esq.**

5 Attorney for Plaintiff

6 **By: /s/ Stephen Watkins**

7 **Stephen A. Watkins Esq.**

8 Attorney for Defendant

9 **Signature Certification**

10 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative
11 Policies and Procedures Manual, I hereby certify that the content of this
12 document is acceptable to counsel for Defendant and that I have obtained their
13 authorization to affix their electronic signature to this document.

14
15 Dated: November 12, 2021 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**

16
17 By: s/ Adrian R. Bacon

18 Adrian R. Bacon ESQ.

19 Attorney for Plaintiff

1 Filed electronically on this 12th Day of November, 2021, with:

2 Notification sent electronically via the Court's ECF system to:

3
4 Honorable Judge of the Court
5 United States District Court

6 All Counsel of Record as Recorded On The Electronic Service List.

7
8 This 12th Day of November, 2021.

9 s/Adrian R. Bacon

ADRIAN R. BACON